

Introduction

Important Notes

This Annual Performance Report is for the report period July 1, 2002 through June 30, 2003, with “future activities” beginning with 2003-04. Several observations need to be pointed out:

- Phase 2 implementation, involving approximately half of the children served in First Steps and a geographic majority of the state, took place on March 1, 2003, only four months prior to the end of the reporting period.
- “Baseline/Trend Data” primarily includes two types of data, July 1, 2002 through June 30, 2003 data which has only four months of Phase 2 included, and June 30, 2003 point in time data which includes the entire state. Data prior to 2002-03 is not included due to the lack of available data and the implementation of the redesigned program, making trend analysis either impossible or largely meaningless.
- The “Future Activities” section of this Annual Performance Report (APR) covers the same time as the previously submitted Improvement Plan, beginning with 2003-04 which is already three quarters over. This section is largely a repeat of the previous Annual Performance Report/Improvement Plan submitted in July 2003.
- This APR makes very few adjustments to the previous APR/Improvement Plan. Any analysis of data would be based on 2002-03 data which does not include a full year of data, or 2003-04 data which is not yet complete. Furthermore, any analysis would be based on data prior to the implementation of the Improvement Plan. Time is needed for the Improvement Plan to be implemented before analyzing for the impact of the plan and looking for additional adjustments.

All that being said, Department of Elementary and Secondary Education (DESE), along with the State Interagency Coordinating Council (SICC), does recognize that some changes to the original redesign were necessary. The following sections provide an overview of the current system and the need for changes.

Background

In July 1998, Department of Elementary and Secondary Education (DESE) contracted with Solutions to conduct a thorough study of the current First Steps (Part C) system and provide recommendations for system redesign. Solutions worked extensively with a Redesign Task Force made up of the State Interagency Coordinating Council (SICC) and Missouri stakeholders to gather public input, conduct surveys and meet with state agencies including the Departments of Health and Senior Services (DHSS), Mental Health (DMH), and Social Services. The final report was issued in September 1999. As a result, forty-five major recommendations were agreed upon to redesign the First Steps System in Missouri. The major components adopted included:

- **Establishment of a Central Finance Office (CFO) and Centralized Data System**
The Central Finance Office (CFO) manages the receipt/recovery of funds and payment of provider bills for early intervention services, and monitors provider enrollment and credentialing. The single data system provides required data for federal reports and fiscal and program planning and management. Common documents including the Individualized Family Service Plan (IFSP) were developed and are required system-wide. These forms support First Steps processes, are coordinated with other agency programs and services, and are linked to the single data system.
- **System Point of Entry (SPOE)**
System Points of Entry (SPOEs) perform initial intake and eligibility determination, and all data collection functions on a regional level. SPOEs are funded through contracts with DESE. There are currently 26 SPOEs across the state. SPOEs may not be providers of early intervention services but may be providers of ongoing service coordination. SPOEs are responsible for all data entry for initial, annual and updated IFSPs for their service area. SPOE staff must attend training and be credentialed as required by their contracts with DESE.
- **Service Providers**
All providers of early intervention services including independent service coordination must be credentialed, be Medicaid providers, and enroll in the CFO in order to receive authorizations and payment for provision of early intervention services.

- **Comprehensive System of Personnel Development**

The Redesign recommendations included the development of standardized training modules that would be required for all providers of Part C services in the state. Training is provided regionally by credentialed trainers who have met standards set by the state. Exit exams are required for each module. Training modules that have been developed and implemented include:

- Orientation to First Steps—this covers the philosophy and intent of Part C services, federal and state rules and the Individualized Family Service Plan (IFSP) process.
- Evaluation and Assessment—this covers required steps in evaluation to determine eligibility and assessment for ongoing IFSP programming. Effective practices for assessment of very young children, selection of instruments to meet individual needs and report writing are presented.
- IFSP Outcomes and Intervention in Natural Environments—this covers effective practices in developing functional outcomes and embedding early intervention services in the daily routine of families' lives.
- Transitions—this covers effective planning for transition into, within, and out of First Steps for families and children.
- Service Coordination—this covers the role and responsibilities of intake and ongoing service coordinators.
- System Point of Entry (SPOE) Training—this covers all responsibilities of the SPOE staff including intake, eligibility determination and data entry for all Part C functions including IFSP data for eligible infants and toddlers.

In January 2002, the contracts for the CFO and five SPOEs were awarded. This began the Phase 1 implementation in eighteen counties. Eligible infants and toddlers were converted from the old system to the new data system through a series of conversion activities between DMH, DHSS and the designated SPOEs. Beginning on April 1, 2002, all First Steps services were provided to eligible infants and toddlers in these eighteen counties through the five SPOEs in Phase 1. The remainder of the state, Phase 2, began operation in March 2003 through 21 additional SPOEs.

In July 2000, when Missouri began working on the Self-Assessment component of the Continuous Improvement Monitoring Process (CIMP), Division staff and the SICC agreed that a significant amount of self-assessment data had been gathered via the redesign efforts of the state. The state had also begun the implementation of the major components. A joint decision was made to incorporate the data from the Redesign effort and begin to add in appropriate child data from the new system. The Self-Assessment was submitted to OSEP in October 2002.

The co-chairs of the SICC then conducted a conference call with Division staff to identify priority areas based on the Part C Self-Assessment. Three priority areas were identified and presented to the entire SICC at the March 14, 2003 meeting. The SICC agreed on the following three areas:

- Child find to include community awareness;
- Provider recruitment to include natural environments; and
- Individualized Family Service Plan (IFSP) services to include family satisfaction and exit data.

The SICC voted to include the Improvement Plan in the Part C Annual Performance Report (APR) required by Office of Special Education Programs (OSEP). They also agreed to use this format for the SICC annual report. Following that meeting, the DESE received the response from OSEP on the Self-Assessment in which the following areas of noncompliance were noted:

- Child Find
- Correction of previous noncompliance
- Timelines for evaluation, assessment and holding an IFSP meeting.

DESE incorporated the OSEP findings and the SICC priorities in the Part C Annual Performance Report/Improvement Plan which was submitted in July 2003. To date, DESE has not received a letter of response on the APR from OSEP.

Need for SPOE System Changes

SPOEs and service coordinators are the keys to success or failure of the redesigned First Steps program. Several challenges have been faced since implementation of Phase 1 in April 2002. These include, but are not limited to, the following:

- Because SPOEs were contracted through the Missouri Office of Administration, it was very difficult, if not impossible, to make adjustments to the contracts when circumstances indicated a need for adjustments.
- SPOE bids were based on estimated staffing needs which were based on estimated numbers of children to be served. It appears that the original estimates of children were low, so some SPOEs did not have adequate staff to handle all referrals in a timely manner. The contract situation did not allow for staffing adjustments.
- Some SPOEs experienced large staff turnover, and the time needed to replace and train staff put them out of compliance on timelines.
- Oversight of ongoing service coordinators and providers was not built into the redesigned system.

Due to these limitations of the original SPOE design, a new contract was proposed to address the concerns and is anticipated to be in place by July 1, 2004, for Phase 1 SPOEs when the original Phase 1 contracts are due to expire. The following excerpts are from the current (prior to subsequent amendments) request for proposal (RFP) for First Steps Phase 1 SPOEs. Additional information pertaining to changes in service coordination can be found under probe CE.I. This RFP is expected to result in significant improvements in child find, timelines and service delivery. At such time as improvements are seen, Phase 2 SPOEs may also be re-bid.

Excerpts from Request for Proposal for First Steps System Point of Entry (SPOE) for Phase 1 SPOEs (RFP No. B3Z04176)

Note: Subsequent amendments to the RFP are not included in the following text.

1.3.2 Existing First Steps System Structure

In the last several years, the Missouri First Steps System underwent a redesign process to the infrastructure and operating procedures that included the following components:

- a. State Interagency Coordinating Council (SICC) – The federal regulations implementing Part C of IDEA requires the establishment of State Interagency Coordinating Council to advise and assist the state agency in their responsibilities for the First Steps System. For more information about the SICC, refer to the Missouri State Regulations for Implementing Part C of IDEA
- b. Local Interagency Coordinating Councils (LICCs) - In addition to the State Interagency Coordinating Council, Local Interagency Coordinating Councils (LICCs) were established for more localized involvement in the First Steps System.
- c. Central Finance Office (CFO) - The State of Missouri contracted with a central finance office. The primary responsibilities of the CFO are listed in the subparagraphs below.
 - 1) Provider Matrix - First Steps Provider Enrollment System – The CFO enrolls First Steps service providers who meet the criteria identified in the Missouri State Regulations for Implementing Part C of IDEA and develops and maintains a list of all service providers authorized to provide the various First Steps activities and services. This list of authorized First Steps service providers is referred to as the provider matrix.
 - 2) Fiscal Management – The CFO issues authorizations for services to First Step service providers, processes the authorizations and pays the providers, and seeks reimbursement for services from applicable funding sources on an individual child basis.
 - 3) Child Data System Design and Management – The CFO has developed the child data software ensuring that specific child data is available to local and state planners for compliance monitoring, financial forecasting, and budgeting purposes. The child data software developed by the CFO is fully HIPAA compliant. As specified in this RFP, the SPOE has requirements related to entering information into the child data system.

- d. Ongoing Service Coordination – A formalized system of ongoing service coordination is currently utilized. Independent ongoing service coordinators enroll through the First Steps Provider Enrollment System of the CFO described above and are included in the provider matrix as authorized ongoing service coordinators. Ongoing service coordinators are designed to be responsible for coordinating and managing the First Steps early intervention service delivery to children and families with an active IFSP in the First Steps System. Ongoing Service Coordination is provided by both independent service coordinators and Department of Mental Health (DMH) service coordinators.
- e. First Steps Facilitators – First Steps Facilitators were put into place in order to provide technical assistance to the SPOEs and Local Interagency Coordinating Councils (LICCs).
- f. System Points of Entry (SPOE) - System Points of Entry (SPOEs) were established statewide for all children referred to the First Steps System. Information about the existing SPOE contracts awarded, are included later in this section and in Attachment 5. The SPOEs were designed to be responsible for facilitating the process for a child and family from referral through the intake and eligibility determination process to the completion of a child's initial IFSP. In addition, each SPOE was required to maintain early intervention records and serve as the electronic link to the CFO. Attachment 1 provides a flow chart of the intake and eligibility determination process.
 - 1) SPOE contractors were not eligible to be a First Steps Early Intervention Service Provider in the same region(s) they were awarded a contract to be the SPOE.
 - 2) The First Step Redesign has been operating for several years in various forms of completion. However, based on information learned through the process, several changes are being implemented to the process. The changes are summarized below. Many of the changes have resulted in changes to the requirements contained in this RFP for System Point of Entry (SPOE) services as compared to previous RFPs (and their resulting contracts) that have been issued for System Point of Entry (SPOE) services.

1.3.3 Changes Being Made to Existing First Steps System Structure beginning July 1, 2004

The Department of Elementary and Secondary Education is implementing a number of changes to the infrastructure and operating procedures for First Steps from what have been in place in the past. Key highlights of the changes are provided in the following paragraphs:

- a. State Interagency Coordinating Council (SICC) – No significant changes.
- b. Regional Interagency Coordinating Councils (RICCs) – A Regional Interagency Coordinating Council (RICC) will be developed within each SPOE region that's purpose will be to assist the Department of Elementary and Secondary Education and the SPOE with the evaluation of the effectiveness of the regional SPOE System, the services to children and families, as well as child find and provider recruitment activities.
- c. Central Finance Office (CFO) - The State of Missouri has contracted with a central finance office pursuant to C203040001. The main change involving the CFO is the fact that the Child Data System will become a web based system verses the previous software application.
- d. System Points of Entry (SPOE) – The responsibilities of the SPOEs will change so that SPOEs will have over-all administrative responsibility for all activities necessary to operate the First Steps System at a regional level. See Contractual Requirements for specific requirements.
- e. Family Service Coordination (FSC) – Changes are being made regarding the process/structure formerly referred to as ongoing service coordination. Service coordination is defined by Missouri State Regulations for Implementing Part C of IDEA as, "...the activities carried out by a service coordinator to assist and enable an eligible child and the child's family to receive the rights, procedural safeguards and services that are authorized to be provided under the State's early intervention program." Family Service Coordination provides the vital link between families, service providers and SPOE administration as well as providing a level of direct services oversight.

- 1) As a result of the changes being implemented, service coordination by independent service coordinators will no longer be used. Instead, SPOEs will provide sixty percent (60%) of the family service coordination function and the remaining forty percent (40%) will be provided by the Missouri Department of Mental Health (DMH) through the DMH regional centers.
- 2) The DMH service coordinators will continue to be enrolled through the First Steps Provider Enrollment System managed by the CFO. DMH service coordinators will be responsible for coordinating and managing the First Steps early intervention service delivery to children and families assigned to DMH service coordination.
- 3) After the changes being implemented via this RFP for Regions 1, 2, and 3, are ultimately implemented on a statewide basis, the 60/40 percentages equate to the Department of Mental Health providing family service coordination services for approximately 1800 children in the State of Missouri.

f. Regional First Steps Consultant – The First Step Facilitator service contracts have or will be expiring shortly. New specifications are in the process of being drafted, however, the new specifications will be different than what was previously required pursuant to the Facilitator contracts. It is anticipated that the Regional Consultant contracts will include more communication and interaction with the Department of Elementary and Secondary Education and more SPOE coordination and technical assistance, especially in such areas as Child Find, Provider Recruitment, marketing, etc.

1.3.4 Compliance Monitoring

In addition to the services described above, the Department of Elementary and Secondary Education is required by federal regulations to conduct compliance monitoring of the First Steps System. Specific information about such requirements and about the Missouri First Steps System can be found on the internet at: <http://dese.mo.gov/divspeced/FirstSteps/index.html>.

2.2.3 SPOE Personnel Requirements

The contractor must have and provide the necessary number of personnel trained and available to provide the services required herein based on the estimated child counts provided in Attachment 4. Attachment 3, included with this document, contains information regarding personnel and suggested staffing levels based on child counts. The contractor must ensure that all personnel performing services pursuant to the contract meet the personnel requirements stated in the Missouri State Regulations for Implementing Part C of IDEA.

a. SPOE Director - The contractor must provide a program administrator (hereinafter referred to as the SPOE director) who shall be responsible for over-all program oversight, all administrative functions associated with operating the SPOE, and ensuring that day to day operations are conducted in a business-like manner at all times.

- 1) The SPOE director must have a minimum of a Bachelors degree and must be an experienced manager experienced in operating in accordance with sound business practices.
- 2) The SPOE director must also have some experience in early intervention services and must serve as a leader and proactive advocate of the Missouri early intervention (First Steps) model and must understand the distinction between the medical model (wherein the various therapies are the focal point of the program) and family oriented/family capacity building (where the focal point is to build a families capacity to deal with those issues surrounding developmental delays and other appropriate medical issues with their infants and toddlers).
- 3) The SPOE director shall have the responsibility for implementation of any corrective actions issued by the state agency resulting from compliance monitoring by the state agency and child complaint decisions and due process hearing decisions.
- 4) The SPOE director shall assist the state agency with investigation of provider and/or child complaint issues raised in the region.
- 5) The SPOE director or designated representative approved by the state agency must attend a maximum of six (6) SPOE operational meetings each year as directed by the state agency. The state agency will give the contractor a minimum of two (2) weeks notice of the time, location, and date of the meeting.

b. Family Service Coordinator - The contractor must provide the actual number of family service coordinators necessary to provide sixty percent (60%) of the family service coordination services required herein, based on the estimated child count numbers included in Attachment 4 (2% of the population of children under age 3).

1) The contractor must provide and maintain staffing levels for family service coordinators based on a caseload of no less than 40 children and no more than 60 children per family service coordinator. The actual ratio within those parameters may vary based on the contractor's operational structure. For informational purposes, the level of staffing included in Attachment 4 is designed to provide professional staff for all service coordination needs, as well as a pool of personnel for other SPOE responsibilities such as child find, provider recruitment, promotional effort, and other administrative duties and is based on a caseload of 40:1. The contractor shall agree and understand that the numbers in Attachment 4 were determined based on historical child count data using assumptions which may or may not be accurate. The assumptions used may not take into consideration costs associated with other contract service requirements.

- In the event that child count numbers vary such that the contractor's ratio of children to family service coordinators drops below 40:1 or increases above 60:1 on a consistent basis for the entire SPOE operation, the contractor must notify the state agency in writing. The state agency will review the situation and shall determine if an amendment to the contract is necessary to modify the number of family service coordinators assigned. If such an amendment is determined necessary by the state agency, the Division of Purchasing and Materials Management shall process a formal amendment to the contract to increase or decrease the number of family service coordinators to enable the contractor to remain within the required ratio. The resulting change in contract pricing shall be determined using Exhibit D from the contractor's awarded proposal. The decision regarding the necessity for a contract amendment shall rest solely with the State of Missouri and shall be final and without recourse.

2) At a minimum, each family service coordinator must have a Bachelor's degree in Elementary Education, Early Childhood Special Education, Early Childhood Education, or a related human service field (e.g. psychology, sociology, social work, child/human development, public health, family studies, or nursing).

3) The contractor shall provide family service coordinator(s) who shall serve as the primary spokesperson(s) for the Missouri First Steps System and must support the purpose and goals of the state agency related to the program. Each family service coordinator must be a leader, and proactive advocate of the Missouri early intervention (First Steps) model. The contractor must ensure that each family service coordinator is fully trained in the philosophy and functions of this critical position and that each family service coordinator understands the distinction between a medical model (wherein the various therapies are the focal point of the program) and family oriented/family capacity building (where the focal point is to build a family's capacity to deal with those issues surrounding developmental delays and other appropriate medical issues with their infants and toddlers). The family service coordinator must be able to build relationships with the families as well as service providers. The family/family service coordinator relationship is essential to the effective functioning of the First Steps System.

4) The family service coordinator may function in both the intake and on-going services role and shall serve as the IFSP team leader and facilitator of the IFSP process. The family service coordinator shall serve as the lead SPOE representative and "offeror of services" in the IFSP process. The family services coordinator shall facilitate consensus for needed services, appropriate levels of service, and location of services.

5) The family service coordinator must complete and keep all required paperwork up-to-date at all times.

2.2.5 Additional Administrative Operational Requirements of the SPOE:

a. RICC - The contractor shall organize, develop, and appoint a Regional Interagency Coordinating Counsel (hereinafter referred to as RICC) within the region awarded that shall be designed to assist the contractor in an advisory capacity and help the contractor by serving as a local contact with parents, cooperating agencies, and other entities from the region interested in the early intervention system. The contractor shall comply with the following with regard to the contractor's responsibilities and duties regarding the RICC. Additional information about the role of the RICC is included in Attachment 2.

b. Child Find - The contractor shall develop, implement, maintain, and continuously evaluate a system of child find within the region awarded that will reduce “inappropriate” First Steps referrals, to the extent possible and that will increase appropriate referrals and visibility regarding the First Steps System. The contractor shall utilize the RICC and Regional Consultants in developing, maintaining, and operating, as well as in evaluating the child find system that is visible and known throughout the region to ensure that the following activities and responsibilities are performed and/or met.

1) The following must be provided to appropriate agencies in the region, as defined in the Missouri State Regulations for Implementing Part C of IDEA (hospitals, child health care providers, local school districts, public health organizations/ facilities, early intervention service providers, participating agencies, and other social service and health care agencies and providers):

- Training and other information in First Steps eligibility criteria.
- Information to assist with identification of all children (birth through two) with disabilities.
- Materials containing basic First Steps information.
- Other public awareness activities such as brochures, public service announcements, etc., to targeted audiences including Parents as Teachers, and the other appropriate agencies defined in the regulations.
- The procedures for obtaining early intervention services for the families of identified children.

2) Documentation of Child Find efforts will be monitored through the state agency compliance monitoring process, by the RICC, and by Regional Consultants.

3) If the number of inappropriate referrals to the contractor's SPOE rise to a level that adversely impact the ability of the contractor to administratively handle the workload, the contractor, in collaboration with the RICC and Regional Consultants, shall analyze the data, identify the reasons for the inappropriate referrals, and take action to correct the situation (i.e., identify local professionals to discuss / train the referring agency in the appropriate eligibility criteria, or other as necessary).

c. Provider Recruitment - The contractor shall develop, implement, and maintain a system of provider recruitment within the region awarded in order to increase visibility regarding the First Steps System and encourage and assist providers to enroll as First Steps service providers with the CFO. The contractor shall utilize the RICC and Regional Consultants in developing, maintaining, and operating a provider recruitment system that is visible and known throughout the region. Documentation of Provider recruitment efforts will be monitored through the state agency compliance monitoring process, by the RICC, and by Regional Consultants.

d. First Steps Marketing – The contractor shall market and promote the SPOE throughout the region. The contractor shall utilize the RICC and the Regional Consultants for assistance, as possible in such marketing endeavors. The contractor, the RICC, and Regional Consultants should develop a working relationship with the regional consultants and providers on the provider matrix in order to function appropriately and to promote the Missouri First Steps System within the region.

e. Peer Reviewer Process - The contractor must develop, implement, and maintain a peer review process within the region awarded to be used for assessments/evaluations, review of IFSPs, and to provide a mechanism to address problem areas and offer solutions to identified problems. The contractor must develop a group of peer reviewers from the provider matrix that shall be available for both the contractor and the state agency to draw from for peer review services as specified in the service requirements herein. The contractor must ensure that the group consists of an adequate number of necessary disciplines of providers including, but not limited to occupational therapists, physical therapists, speech/language therapists, special instructors, and others.

2.3.5 Family Service Coordination Requirements

The contractor shall agree and understand that the assigned family service coordinator shall serve as the link between the child/family, the contractor, and the service provider(s). Each family service coordinator assigned must have the ability to relate to the family and must devote the appropriate level of time necessary to build that relationship. The following family service coordination requirements shall apply to both SPOE family service coordinators and DMH family service coordinators. The contractor shall provide the DMH family service coordination staff with technical assistance regarding the responsibilities of service coordination and procedural requirements for the First Steps System as well as the identification of issues that adversely impact the First Steps System, resolutions to those issues, and implementation of Part C of the IDEA and the Missouri State Regulations for Implementing Part C of IDEA. In addition, the contractor shall provide DMH family service coordinators with all information provided to the field from the state agency and the CFO.

2.3.7 Peer Review Services:

- a. Contractor's use of peer review process – In addition to using peer reviewers as the assessment/evaluation team, the contractor shall use the peer reviewers as needed to provide assistance to the contractor in addressing issues surrounding eligibility, IFSP development, level and type of services on the IFSP, and regular “quality control”/oversight of the evaluation and IFSP process.
- b. State agency use of peer review process - The contractor shall agree and understand that the state agency shall use the peer review group for targeted review of IFSPs to assist in monitoring IFSP development, and for other oversight and monitoring purposes as deemed necessary by the state agency.

2.4.1 Child Records

The contractor shall establish and maintain both a hard copy paper file and an electronic file record as described below for each child referred to the SPOE, regardless of the outcome of the intake process (i.e.: eligible or not, accept or decline services, etc.).

- a. The contractor shall use the web based child data system for all data entry to establish and maintain the communication link between the contractor's records and the child data system.
- b. The contractor shall use the most current, approved First Steps forms for record keeping and shall maintain all required items in the child's official First Steps record. The forms will be provided to the contractor by the state agency via paper copy, diskette, CD-Rom, or the Internet.
- c. The contractor shall use the communication protocol established by the CFO to transmit the electronic information to the CFO.
- d. The contractor, through the assigned family service coordinator, shall perform on-going record keeping as required herein. The contractor must enter the information listed below into the child data system by no later than three (3) working days of receipt and shall maintain the same information in the hard copy paper file for each child. Accurate, complete and timely records are necessary to operate an efficient early intervention program. The contractor must monitor progress notes being entered into the system by service providers.
 - 1. Information from IFSP reviews which result in changes;
 - 2. Information from annual IFSP reviews;
 - 3. Any changes to the general demographics and information regarding any enrolled child.
 - 4. Progress notes from providers
- e. The contractor must have procedures in place for data entry and ongoing monitoring of the child data system to ensure that accurate and up-to-date data is available.

2.4.5 Target Eligible Child Count

After eleven calendar months of service provision and child find efforts and prior to the expiration of the original contract period, the contractor, the RICC, the Regional Consultant, and the state agency shall mutually determine a target eligible child count for the region. The target eligible child count shall be determined based on and using all available data sources including, but not limited to child find activities, application of eligibility criteria, parental decisions regarding entry into the program, population demographics, etc. The target eligible child count shall be used by the state agency as a performance standard to measure the contractor's performance. (See performance standard information provided later in this document.)

2.5.5 Performance Standards -

a. The contractor shall agree and understand that provision of the services in accordance with the requirements stated herein is considered critical to the efficient operations of the Missouri First Steps System. According, the contractor's performance pursuant to the requirements of the contract shall be continuously measured by the state agency, or state agency designee, to ensure compliance with the requirements. The contractor shall agree and understand that the measurements used to determine compliance with the standards shall be based on the data in the child data system at the time performance is measured.

The state agency shall notify the contractor in advance of the approximate date the measurements shall be taken from the data. However, the contractor shall be solely responsible for the accuracy of the data in the system. Changes to the measurements shall not be made at a later date as a result of inaccurate data at the time of the initial measurement. Listed below are the specific performance standards that shall be measured and reviewed by the state agency:

- 1) Standard - Target Eligible Child Count – By at least the eleventh month of the first contract period, the contractor must attain the target eligible child count that was determined as specified in the Record Keeping and Reporting Requirements Section of this document. In addition, the contractor must maintain the target eligible child count throughout each potential renewal period.
- 2) Standard - Medicaid - The contractor must identify 100% of Medicaid eligible children and record eligibility status in the child data system throughout each contract period. This includes asking the appropriate questions, completing all Medicaid appropriate enrollment documentation, assisting the family in processing the Medicaid enrollment and acquiring a parent signature to decline Medicaid participation as appropriate.
- 3) Standard - IFSP time requirements - In a minimum of eight (8) calendar months (not necessarily consecutive) of each contract period, the contractor must be able to document that all children found eligible for First Steps had their initial IFSP team meeting within the required forty-five (45) calendar days after the child's referral to the contractor.
- 4) Standard - Compliance Monitoring Corrective Actions - All findings on a corrective action plan resulting from compliance monitoring must be addressed to the satisfaction of the state agency by no later than ninety (90) calendar days after approval of the corrective action plan by the state agency.
- 5) Standard - Standard of Practice in Early Intervention (SPEI) - 80% of the IFSPs sampled for children in the contractor's region must attain a passing score for a specified level of practice according to the SPEI scoring guide. Information regarding the SPEI and sampling is provided below:
 - Using national experts, parents and other stakeholders, the state agency will develop Standards of Practice in Early Intervention (SPEI) for IFSPs. This group of stakeholders will also develop levels of practice for each standard, so that each standard can be rated along a continuum of poor to excellent. This will result in an objective scoring guide. Training on the SPEI will be available to service coordinators and early intervention service providers.
 - The state agency will credential a small number of individuals to evaluate IFSPs based upon the SPEI. These individuals will randomly sample IFSPs for children in the contractor's region to determine the percentage of IFSPs that meet a specified level of practice according to the scoring guide.

b. First Renewal Period – *Additional Incentive Payment for Meeting Standards* - If the contract is renewed for the first renewal period, the contractor's performance during the first renewal period shall be measured in the above standards areas. If funding for additional payments is available, the contractor shall receive an incentive payment of 1% of the total amount paid to the contractor for provision of services for the first renewal period for performance that meets or exceeds the performance standards specified. The contractor shall agree and understand that in order for the additional payment to be made to the contractor, the contractor must meet or exceed all of the standards listed (with the possible exception of the SPEI standard which shall only be measured for purposes of additional incentive payments if the SPEI is developed prior to 9/1/04). In addition, the contractor shall agree and understand that any such additional payment shall only be available for the first renewal period and shall not be available for any subsequent renewals.

c. Second Through Fourth Renewal Period – *Liquidated Damages for Not Meeting Standards* - If the contract is renewed for the second renewal period, the contractor's performance during the second renewal period shall be measured in the above standards areas. However, additional payments shall not be made to the contractor for compliance with the standards since the standards become the expected level of performance.

Instead, if the contractor does not meet at least the minimum performance standards stated above for each of the standards measured, the contractor shall pay the state agency liquidated damages in an amount equal to one half percent (0.5 %) of the total amount paid to the contractor for provision of services for the second renewal period. Since the amount of actual damages would be difficult to establish in the event the contractor fails to comply with the requirements, the contractor shall agree and understand that the amount identified as liquidated damages shall be reasonable and fair under the circumstances.

SPOE Software Changes

The CFO is under contract to revise the SPOE software. The following changes, called webSPOE, are scheduled to be implemented on July 1, 2004. Bolded items are key changes and are referred to later in this document.

Current SPOE software	Upcoming webSPOE software	Implications for First Steps System
Software loaded on computers with access to electronic records only at designated machines. Data manually batched to the CFO.	Web-based software accessible through any computer with internet access. Data will be "live" when entered.	More flexibility for SPOEs and service coordinators and increased accessibility which will result in more up to date electronic records.
Software and electronic record access limited to SPOEs.	<p>SPOEs and service coordinators will have access to the software and electronic records for the children for whom they are responsible.</p> <p>Direct service providers will be able to view the IFSP online for the children they provide services for or if the direct service provider is a member of the IFSP team.</p> <p>The online system will be able to track and log all access to the electronic record. Security and accessibility to the electronic case file will be tightly maintained.</p> <p>Electronic records will be able to be electronically transferred to new SPOEs as the family relocates throughout the State.</p>	<p>Service coordinator access to the electronic records will minimize system delays due to the transfer of and subsequent data entry of paper forms. Direct service providers will have more and better information available as they interact with families.</p> <p>Families will know what information is available and who has access to it.</p> <p>This will reduce the overall time process requirements for families in the First Steps system. Continuity of services will be more streamlined for the family. It will also greatly reduce any potential for duplicate child counts.</p>

Current SPOE software	Upcoming webSPOE software	Implications for First Steps System
Data entry secondary to the evaluation/assessment, eligibility determination and IFSP process	Data entry is very compliance-driven and is essential to the evaluation/assessment, eligibility determination and IFSP process	Business rules will force service coordinators and providers through required steps, thereby ensuring compliance proactively rather than after the fact.
Official EI records are paper documents. Designated data elements are then entered into the SPOE software.	The official EI record will be primarily made up of <ul style="list-style-type: none"> • The electronic record which will maintain most of the required elements/forms of the First Steps program • Paper documents requiring original signatures • Other documents from third parties • Other, primarily optional documents 	The First Steps process will be streamlined due to the elimination of parallel paper and electronic systems which often don't mirror each other. Greater amounts of IFSP data and information will be analyzed across the entire State. Business rules requiring certain actions by SPOEs and service coordinators will equalize and improve the quality of services received by infants and toddlers across the state.
Child demographic data including date of birth, gender, race, language, etc.	Data elements include all current elements.	Allows data to be analyzed by different demographic variables
Referral data including date, source and reason	Data elements include all current elements plus additional items. Referrals can be made online and data will transfer to the child's electronic record to lessen data entry requirements. Reasons for exceeding 45 day timelines will be required.	Referral source information can be analyzed by region and demographics. Failure to meet 45 day timelines can be monitored and adding the reasons for the delays will allow the identification and correction of delays attributed to SPOEs or providers.
Eligibility data including eligibility determination date and primary eligibility (very low birth weight, medical condition or 50% delay)	WebSPOE will walk service coordinators through the eligibility determination process and collect all associated data elements as well as the areas of delay in the five domains if 50% delay is the primary eligibility.	Business rules requiring certain actions by SPOEs and service coordinators will promote best practices and compliance. Monitoring staff will be able to access EI records electronically which will enable them to monitor for the correct application of eligibility determinations.
Diagnosis and medical data	Data elements include all current elements plus additional detail.	More detailed information will allow for analysis of eligibility determinations as well as the types of children being served by First Steps.

Current SPOE software	Upcoming webSPOE software	Implications for First Steps System
<p>Intake/EI data including Intake and IFSP dates, service coordinator, inactivation date and reason. Currently, very little IFSP data is stored electronically other than dates and service authorizations.</p>	<p>Data elements include all current elements plus much more information and functionality. This is the area with the most dramatic change in the new software. The entire IFSP document will be part of webSPOE. All evaluation/assessment data, present levels, outcomes, outcome evaluation, services needed as identified on the IFSP and authorizations will be entered into the electronic record. "Other Services" provided to the child outside of the IFSP will also be recorded online.</p> <p>Service Coordinator Case Notes and service provider Progress Notes will be online.</p> <p>The actual services provided and claimed per IFSP will be able to be reviewed by the IFSP team.</p> <p>Business rules for the software will ensure that required steps for evaluation/assessment, eligibility determination and IFSP development and review are taken by service coordinators.</p>	<p>Business rules requiring certain actions by SPOEs and service coordinators will promote best practices and compliance. Monitoring staff will be able to access EI records electronically which will enable more timely intervention and correction of noncompliance.</p> <p>Electronically maintained IFSP information will also allow Compliance activities to occur on a broader scale in a shorter period of time.</p> <p>Statewide outcome-based reporting will be possible.</p> <p>The new system will also allow more oversight information to be available to both the IFSP Team and SPOEs.</p> <p>If a new family service coordinator is assigned to the family, the new service coordinator will be able to quickly review the electronic case file, all services provided and all IFSP information online.</p> <p>The IFSP Team will be able to address any aberrations in services provided during Team Reviews.</p>
<p>Family and insurance data</p>	<p>Data elements include all current elements plus some additional items. Also included in webSPOE is a Family Module which will contain information on and links for First Steps, family interim and exit surveys, and provider and stakeholder surveys.</p> <p>Families will be able to report if providers claimed services but the service was not provided to the family.</p>	<p>Family survey data will provide essential information on the progress and outcomes of infants and toddlers receiving services through First Steps. This is critical information for monitoring service delivery as well as program evaluation and improvement efforts.</p>
<p>Authorizations for services including dates, providers, frequency, intensity, duration, etc.</p>	<p>Data elements include all current elements as well as whether services are for eligibility determination purposes or are necessary services determined by the IFSP team. Services will be tied to outcomes. A "No Provider Available" option will be included as well as the documented reason for why the Provider was not available.</p>	<p>Analysis can be conducted on services and their corresponding outcomes. The "No Provider Available" option will allow DESE to monitor for provider shortages both regionally and of specific provider types. This information is critical to guide provider recruitment activities.</p> <p>Potential delays in service authorization entry will be greatly reduced.</p>

Current SPOE software	Upcoming webSPOE software	Implications for First Steps System
Pre-built reports are available to SPOEs	Additional and more flexible reports will be available to SPOE directors and other personnel and service coordinators	More versatile reports will allow SPOEs and service coordinators to manage case loads in a more efficient and timely manner. SPOE Directors will be able to closely monitor SPOE operations, Service Coordinators, and providers.
Communication to the First Steps stakeholders is completed via a ListServ	Communication with Providers, Service Coordinators and SPOEs will be completed via a "Bulletin Board" system within webSPOE.	The Bulletin Board will serve as a centralized and easily available communication methodology to DESE with identified stakeholders.
DESE receives the SuperSPOE database twice a month. The database contains much, but not all of the data maintained by the CFO.	DESE will have on-line, real-time access to all First Steps data.	Real-time access to all data will allow instant access to and monitoring of data. This will allow more timely identification and correction of noncompliance.
Service provider data (Matrix) is maintained separately from the child data system.	<p>The new Provider Module will enhance providers' ability to interact with the First Steps system. Providers will have access to the electronic records of children whom they are serving and will be able to enter progress notes on line.</p> <p>Providers will also have real-time capabilities to review authorizations and submit claims online.</p> <p>Information about providers will be enhanced so that families have more data when choosing service providers including the specific First Steps Training Modules completed.</p>	<p>The electronic link between providers and the children they are serving will allow for some monitoring of providers on an ongoing basis. Noncompliance or questionable practices can be identified and corrected in a timely manner.</p> <p>This will reduce the paperwork and paper time requirements of the Provider base. This will allow more time for Providers than the current paper process allows. Providers will be more satisfied in the First Steps system.</p>

Explanation of “Future Activities” sections

- New Cluster/Probe – Refers to clusters, questions and probes required by OSEP
- IP Key and Activity Key – After submitting the Part C Improvement Plan in July 2003, the Division developed a work scope. The IP Key and Activity Key are primarily for internal tracking of progress.
- Activity Groups – General description of the activity
- Future Activities to Achieve Projected Targets – More detailed activities which will lead towards attainment of targets
- Projected Targets/Evidence of Change – The measurement of progress for the activities
- Projected Timelines – Anticipated completion date for the activities
- Resources – The sections responsible for completing the activity.
 - CISE – Center for Innovations in Education
 - CMS – Compliance Monitoring System database
 - Comp – Compliance
 - Data – Data Coordination
 - DSE Staff – various Division of Special Education staff members
 - EP – Effective Practices
 - Facilitators – First Steps facilitators
 - Funds – Funds Management
 - Management Team – First Steps Management Team made up of Division Staff
 - Monitoring System – System for monitoring all elements of the First Steps program
 - SPOEs – System Points of Entry